

Written Comments of Consumers Union, submitted to the National Organic Standards Board Meeting, May 6, 2002
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Consumers Union (CU), non-profit publisher of Consumer Reports magazine, has been researching environmental labels on food products for over two years and has developed a website where consumers can learn about the who and what are behind the labels and can be found at www.eco-labels.org. CU has been a long time supporter of sustainable agriculture practices and educates consumers about these practices. Furthermore, the eco-labels website project evaluates the standards and organizations behind the labels against a standard set of criteria which sets the bar for what consumers should expect from these labels. CU is here today to reiterate issues from our comments to the NOSB on livestock feed, poultry access and processing recommendations that are not in keeping with consumers expectations of organic.

The use of genetic engineering has been prohibited for use in organic production by the NOSB. However, the language in some of the recommendations is weak and in some cases creates loopholes that could theoretically permit the use of genetically engineering in organic production. This method is otherwise prohibited in organic production and exemptions to NOSB review or requirements undermine the meaning and integrity of organic to consumers.

Processing

Consumers Union disagrees with the NOSB processing comments that biologic processes not be reviewed by the NOSB since “most if not all” are acceptable and do not “break covalent bonds” (a strong and permanent chemical reaction). However, biologic processes (i.e. extraction) can also break covalent bonds. Enzymes, acids and additives are example of substances that can be derived from or made with nonpathogenic bacteria that can be used in organic production and processing. Therefore Consumers Union recommends that biologic processes should be required to be reviewed by the NOSB and that the use of or substances derived from genetically engineered bacteria should be explicitly prohibited.

Livestock Feed

Consumers Union disagrees with the NOSB recommendation that the National Organic Program should not establish requirements for agricultural products used as carriers in livestock feed ingredients. While carriers may not meaningfully affect the nutritional composition of the feed ration, the source of the carrier can affect the organic integrity of the feed. Without any requirements, there is a high risk that these carriers could be derived from genetically engineered or pesticide treated crops (e.g. corn and soy). Consumers Union strongly urges the NOSB to regulate the source of livestock feed carriers to be from only organic sources. Similarly, CU urges the NOSB to regulate the source of gelatin, used as carriers for feed ingredients, to also be from only organic sources, especially since most consumers who purchase organic are also concerned about any potential transfer issues with mad cow disease.

Poultry Access to the Outdoors

Consumers Union disagrees with the NOSB assessment that the nutritional needs of poultry with regard to access to the outdoors are outside the realm of “consumer perception,” “humane consideration,” or “preventative health care management.” Just as ruminant animals receive nutritional value from access to pasture, consumers expect that poultry will also be subject to similar requirements. In fact, access to a vegetative outdoors is critical to the consistency of the organic label on all certified meat products. However, the NOSB recommendations would accept a concrete driveway with two inches of topsoil to satisfy the requirement for poultry access to outdoors. This is not what consumers expect when buying organic poultry. Access to a vegetative outdoors allows poultry to better exert natural behavior patterns such as foraging for insects and seeds, and eating grass (which also helps digestion). These activities also encourage preventative health care management. This is what consumers expect from organic poultry production.

Consumers do not expect organic poultry to be raised with access to an outdoors that is void of vegetation and an environment that is not natural. Many consumers who pay the premium on organic expect that humane raising includes access to an environmental that is healthier and more natural for poultry.

Consumers Union would like to thank the NOSB for the opportunity to make public comment.